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**From:** "Schiltz, Matthew G." <MSchiltz@schiffhardin.com>  
**Sent:** 7/15/2016 5:26:17 PM +0000  
**To:** "Judge, Jonathan" <jjudge@schiffhardin.com>; "Parsons, Jeffrey" <jparsons@bmpilp.com>  
**Subject:** RE: Hinson - post-trial options memo

Jeff – I'm in my office and happy to talk at your convenience.

Matt

312-258-5536

**From:** Judge, Jonathan  
**Sent:** Friday, July 15, 2016 12:00 PM  
**To:** Parsons, Jeffrey  
**Cc:** Schiltz, Matthew G.  
**Subject:** RE: Hinson - post-trial options memo

Jeff,

Please call my colleague Matt Schiltz (312-258-5536). Matt tried the case with me and know the exhibits quite well.

Jonathan

**From:** Parsons, Jeffrey  
**Sent:** Friday, July 15, 2016 12:26 PM  
**To:** Judge, Jonathan  
**Subject:** RE: Hinson - post-trial options memo

Jon,

Is there someone else at your firm who is equally knowledgeable about the evidence at trial? If so, I'd like to speak with him or her -- or with you later this afternoon.

From my review of the transcripts thus far, I cannot find any evidence offered by plaintiff to support the proposition that the seat was unreasonably dangerous to use without a warning that it should not be used by children under 2. The only evidence I can find that gets close is the American Pediatric Academy's recommendation that children under 2 should be seated rear facing because it is "five times safer" -- which is not the same as saying that front faced seating under 2 is "unreasonably dangerous".

Thus, I am wondering whether Plaintiff actually met its burden of proof or whether there is insufficient evidence to support the jury's verdict.

Jeff

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**EXHIBIT A**